

1 CRAIG H. MISSAKIAN (CABN 125202)
2 United States Attorney

3 MARTHA BOERSCH (CABN 126569)
4 Chief, Criminal Division

5 NIKHIL BHAGAT (CABN 279892)
6 Assistant United States Attorney

7 450 Golden Gate Avenue, Box 36055
8 San Francisco, California 94102-3495
9 Telephone: (415) 436-7193
10 FAX: (415) 436-6982
11 nikhil.bhagat@usdoj.gov

12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,) CASE NO. CR 23-471 WHO
17 Plaintiff,)
18 v.) **DECLARATION OF NIKHIL BHAGAT IN
19 KEITH LATTERI,) SUPPORT OF UNITED STATES' OPPOSITION
20 Defendant.) TO DEFENDANT'S SECOND REQUEST TO
21) EXTEND SELF-SURRENDER DATE**
22)
23)
24)
25)
26)
27)
28)

19 I, Nikhil Bhagat, hereby declare the following:

20 1. I am an Assistant United States Attorney for the Northern District of California and am
21 assigned to prosecute the above-captioned matter.

22 2. On July 21, 2025, and July 22, 2025, I corresponded with an attorney in the Federal
23 Bureau of Prisons' Office of General Counsel. The information in this declaration is based on that
24 correspondence.

25 3. According to Bureau of Prisons records, the defendant has been designated to the Federal
26 Medical Center Lexington.

27 4. That designation was made on June 3, 2025.

28 5. This declaration does not contain all of the information that I know about the above-

1 captioned matter but only that which I believe is necessary to support the United States' Opposition to
2 the Defendant's Second Request to Extend Self-Surrender Date.

3 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
4 correct.

5 Executed this 22nd day of July, 2025 at San Francisco, California.
6

7 /s/ *Nikhil Bhagat*
8 NIKHIL BHAGAT
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28